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16 Attorneys for Plaintiff
17 SUSTAINABLE MODULAR MANAGEMENT, INC.

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20 UNITED STATES DISTRICT COURT
21 DISTRICT OF NEVADA

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16 UNITED STATES OF AMERICA, for the) Case No. 2:20-cv-00790-JAD-NJK
17 use and benefit of SUSTAINABLE)
18 MODULAR MANAGEMENT, INC., a)
19 Texas corporation) **PLAINTIFF'S MOTION FOR**
20 Plaintiff,) **LEAVE TO FILE ANSWER TO JE**
21 v.) **DUNN'S COUNTERCLAIM**
22)
23 JE DUNN CONSTRUCTION COMPANY;) **(THIRD REQUEST)**
24 FEDERAL INSURANCE COMPANY;))
25 HARTFORD FIRE INSURANCE;))
26 COMPANY; TRAVELERS CASUALTY;))
27 AND SURETY COMPANY OF;))
28 AMERICA; DOE Individuals I-X and ROE;))
Entities I-X, inclusive,))
Defendants.))
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UNITED STATES OF AMERICA, for the use and benefit of
SUSTAINABLE MODULAR MANAGEMENT, INC. ("Plaintiff" or "SMM") files

1 its Unopposed Motion for Leave to File Answer to JE Dunn Construction
2 Company's ("JE Dunn") Counterclaim (the "Counterclaim"), and in support
3 thereof, would respectfully state as follows:

4 1. Plaintiff's answer to the Counterclaim (Dkt. 25) was due by extension
5 on August 10, 2020.

6 2. As mentioned in Plaintiff's last extension request, the minor daughter
7 of Plaintiff's counsel was diagnosed with Covid-19 approximately two weeks ago.
8 The quarantine concluded yesterday with a full recovery by Plaintiff's counsel's
9 daughter and the transition back to the office for the undersigned counsel, but the
10 disruption involved with the quarantine was substantial. Due to that disruption,
11 and the workload of the SMM's counsel, including multiple hearings and
12 depositions by Zoom, Plaintiff requests an additional extension until August 12,
13 2020 to file its Answer to JE Dunn's Counterclaim.

14 3. JE Dunn has granted the extension and authorized the undersigned
15 counsel to represent that it is not opposed to this Motion for Leave to file SMM's
16 Answer and request for an additional extension of time until and including this
17 Wednesday, August 12, 2020.

18 4. Accordingly, Plaintiff respectfully requests an extension of time until
19 and including August 12, 2020 to file its Answer to JE Dunn's Counterclaim.

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5. Plaintiff will not be requesting any further extensions of time on this matter.

MORRIS LAW GROUP

By: /s/ MICHAEL S. ALFRED

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**Attorneys for Plaintiff
SUSTAINABLE CULTURE**

SUSTAINABLE MODULAR MANUFACTURING

MANAGEMENT, INC.

ORDER

IT IS SO ORDERED.

Dated this 12th of August, 2020.

UNITED STATES MAGISTRATE JUDGE